

Hearing Date and Time: April 8, 2015 at 10:00 a.m. (Eastern Time)

Douglas P. Bartner
Stacey L. Corr-Irvine
SHEARMAN & STERLING LLP
599 Lexington Avenue
New York, New York 10022
Telephone: (212) 848-4000
Facsimile: (646) 848-8318

Attorneys for Ontario Teachers' Pension Plan Board

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11
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LEHMAN BROTHERS HOLDINGS INC., et al.,	:	Case No. 08-13555 (SCC)
	:	
Debtors.	:	(Jointly Administered)
	:	
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**JOINDER OF ONTARIO TEACHERS' PENSION PLAN BOARD TO (I)
THE OBJECTION OF CITADEL ENERGY INVESTMENTS LTD. AND
CITADEL EQUITY FUND LTD. TO THE MOTION TO ALLOW
DISCLOSURE OF THE DERIVATIVE QUESTIONNAIRES PURSUANT
TO SECTION 107(a) OF THE BANKRUPTCY CODE AND (II) THE
OBJECTION OF DERIVATIVE QUESTIONNAIRE
RESPONDENTS TO MOTION TO ALLOW DISCLOSURE
OF THE DERIVATIVE QUESTIONNAIRES PURSUANT
TO SECTION 107(a) OF THE BANKRUPTCY CODE**

Ontario Teachers' Pension Plan Board ("OTPPB") hereby joins in (i) the Objection of Citadel Energy Investments Ltd. and Citadel Equity Master Fund Ltd. to the Motion to Allow Disclosure of the Derivative Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code filed on March 30, 2015 [Docket No. 49030] and (ii) the Objection of Derivative Questionnaire Respondents to Motion to Allow Disclosure of the Derivative Questionnaires Pursuant to Section

107(a) of the Bankruptcy Code filed on March 30, 2015 [Docket No. 49040] (collectively, the “**Objections**” and the parties filing the Objections, the “**Objecting Parties**”). In support of this joinder (this “**Joinder**”), OTPPB respectfully submits as follows:

1. OTPPB and certain of the above-captioned debtors (the “**Debtors**”) were parties to derivatives contracts.
2. OTPPB is listed on Exhibit A to the Debtors’ Motion to Allow Disclosure of the Derivative Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code [Docket No. 48939] (the “**Motion**”) and upon information and belief, the Debtors intend to disclose OTPPB’s confidential information to third-parties.
3. OTPPB, like the Objecting Parties, relied on the protections provided by the Bar Date Order (as defined in the Motion), in submitting its derivatives questionnaires. Accordingly, for the reasons set forth in the Objections, OTPPB objects to the relief requested in the Motion.
4. OTPPB reserves its rights to amend or supplement this Joinder and to incorporate other objections to the Motion filed by other parties in interest in a subsequent joinder filed with the Court or at the hearing to consider the Motion.

WHEREFORE, OTPPB hereby joins in the relief sought in the Objections and respectfully requests that the Court (i) deny the Motion or, alternatively, direct the Debtors to redact all identifying, confidential and proprietary information from any documents disclosed to third-parties or otherwise provide protections for the sensitive commercial information and (ii) grant further relief as the Court deems just and proper.

Dated: New York, New York
April 1, 2015

SHEARMAN & STERLING LLP

By: /s/ Douglas P. Bartner
Douglas P. Bartner
Stacey L. Corr-Irvine
599 Lexington Avenue
New York, New York 10022
Telephone: (212) 848-4000
Facsimile: (646) 848-8318

*Attorneys for Ontario Teachers' Pension
Plan Board*